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U.S.D.A. - Forest Service • State & Private Forestry - Northeastern Area • Broomall, Pennsylvania

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2,4-D

The Environmental Protection Agency (EPA) completed its pre-RPAR review of 2,4-D and concluded that more toxicological information on the herbicide is needed.

The enforcement agency will request manufacturers to provide the missing information. If they fail to do so, their product registrations may be suspended under Section 3 (c) (2) (B) of FIFRA amended.

While studies are under way, 2,4-D will continue to be used. However, should any of the new studies demonstrate a major problem, EPA will take regulatory action without waiting for completion of all the studies.

At this time, EPA wants additional information on 2,4-D in the areas of oncogenicity, reproductive effects, and metabolism in animals. The agency will consult the Scientific Advisory Panel before specifying to the manufacturers precisely what studies are needed.

EPA LABEL IMPROVEMENT PROGRAM

EPA will notify the manufacturers of some 150 forest use herbicide products to improve their labels for the following forest uses: forest trees, Christmas trees, forest tree plantings, forest lands, forest management areas, forest plantations, conifer release, forest site preparation, or individual frill, stump, or basal bark application where stated on the label. Manufacturers will be required to provide separate use directions for different application techniques.

This is part of the enforcement agency's Label Improvement Program (LIP) being implemented because some labels will not be reviewed for 15 years under the present guidelines. RPARed forest use herbicides are not included in the LIP since the review of these labels is presently underway.

PESTICIDE DISPOSAL

The best way to dispose of excess pesticides is to use them for their registered purpose. Some pesticides, however, are not usable and must be destroyed or discarded.

Finding a suitable disposal site is not an easy task. EPA's Regulations for Acceptance and Recommended Procedures for Disposal and Storage of pesticides (40CFR 165) provide information on how to dispose of certain types of pesticides e.g. "incineration", "deep well injection", "chemical deactivation", etc., but provide little practical information about "where".

The following is a partial list of private companies located in the Eastern part of the U.S., which are in the business of disposing of toxic wastes. We have personally contacted these companies and they do accept pesticides on a "case by case" basis. If you have questions on specific disposal problems you may also contact the FIDM Pesticide Specialist in Broomall.

- New York Peter Dunlap, SCA Chemical Waste Systems, Inc., P.O. Model City, NY 14107 - Tele: (716)754-8231 - (5 mi. N. of Niagara Falls)
- Edward Shuster, Cecos International, 4626 Royal Avenue, Niagara Falls, NY 14303 - Tele: (716)278-1811 - (Niagara Falls)
- New Jersey Rollins Environmental Services, P.O. Box 331, Bridgeport, NJ 08014 - Tele: (609)467-3100 - (15 mi. SW of Phila.)
- Advanced Environmental Technology Corp., 520 Speedwell Ave., Morris Plains, NJ 08232 - Tele: (201)539-7111 - (25 mi. W. of NY, NY)
- Maryland Norman Cohen, Browning-Ferris, c/o Johnson & Speake Inc., 7890 Solley Road, Baltimore, MD 21061 - Tele: (301)255-6717 - (Baltimore)
- Ralph Dobson, American Recovery Co., Inc., 1901 Birch St., Baltimore, MD 21225 - Tele: (301)355-0623 - (Baltimore)
- Illinois Nuclear Engineering Co., Sheffield, IL 61361 - Tele: (812)454-2625 - (40 mi. E. of Rock Island)
- Chemical Waste Management of Illinois, 138 & I-94, Calumet City, IL 60409 - Tele: (312)891-1500 - (S. of Chicago)
- Wisconsin Land Reclamation Limited, 2300 S. Green Bay Road, Racine, WI 53406 - Tele: (414)554-6339 - (25 mi. S. of Milwaukee)
- Alabama Mr. Sidot, Waste Management Co., Emelle, AL - Tele: (419)332-2688 - (90 miles Southwest of Birmingham)
- Arkansas Gene Parkinson, Ensco, P.O. Box 1975, Eldorado, AR 71730 - Tele: (501)863-7173 (140 miles South of Little Rock)

EPA'S SECOND ULV AND LV ADVISORY OPINION IS DRAFTED

EPA has drafted a second opinion dealing with Ultra Low Volume (ULV) and Low Volume (LV) application of pesticides.

At present, EPA considers it illegal to apply pesticides at higher concentrations than specified on labels (see Pesticide Quarterly No. 4). However, according to the draft, higher than label concentrations of ULV and LV applications will be permitted in the future where such use is based on a written or published recommendation from a Land Grant College Extension Service, or local, State, or Federal agriculture department.

EPA's advisory opinion is expected to be issued this month.

CARBARYL

After reviewing all available information, EPA is close to making a decision on the registration status of carbaryl. As a preliminary statement, the Agency's Special Pesticide Review Division said it could find neither evidence that carbaryl poses a risk to humans nor any indication of a need for regulatory action at this time.

Carbaryl, an important insecticide to forestry and agriculture, has undergone intensive review (pre-RPAR review) to determine whether the chemical causes birth and other reproductive effects. In addition, EPA reviewed the chemical's potential for producing tumors and mutations.

In its preliminary statement, the agency added one must never conclude that risks from exposure to any chemical are zero, and men and women of child bearing age should avoid unnecessary exposure to carbaryl and other chemicals as well.

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Concern over excessive birth defects and miscarriages in Cape May County, New Jersey, culminated in requests for an injunction to prevent further State spraying of the insecticide Sevin (carbaryl) to control the gypsy moth. At subsequent hearing, New Jersey Health Department officials testified that, in comparison with unsprayed areas, the incidence of birth defects was lower in counties where Sevin was sprayed. The request for an injunction was denied.

CERTIFICATION - USDA PESTICIDE APPLICATORS

EPA announced its intention to approve the USDA plan for the certification of USDA employees to use restricted use pesticides. The announcement and a summary of the USDA plan appeared in the Federal Register on April 2.

The USDA certification program will be administered by three separate agencies: the Animal and Plant Health Inspection Service (APHIS); the Science and Education Administration, Agriculture Research (SEA, AR); and the Forest Service (FS).

Upon finishing training and successfully completing a written examination, USDA employees will be certified for 3 years. At the end of this period, another written test will be required for recertification. If employees desire, they may be certified under appropriate State plans.

APHIS and SEA, AR employees will be certified in only one commercial applicator category, APHIS in the "Regulator Category", SEA, AR in the "Demonstration and Research Category". FS personnel may be certified in 8 different categories.

According to the summary, USDA personnel will comply with substantive State standards. EPA and State enforcement personnel will have access to USDA property at reasonable times for sampling, inspection, and observation.

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